

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.  
LUHANA IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:  
  
ALL CASES

I, Roopal P. Luhana declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Defendants or contain references to documents produced and marked confidential by Defendants, Plaintiffs filed the following under seal:

Document	Description	Designating Party
<b>Portions of the Parties' Discovery Letter Brief Regarding Orchowski Rebuttal Report</b>	References to information deemed confidential by Defendants	Defendants
<b>Exhibit A</b>	Rebuttal Expert Report of Lindsay Orchowski, marked "Highly Confidential"	Defendants
<b>Exhibit B</b>	Exhibit 434 to deposition of Gus Fuldner, marked "Highly Confidential"	Defendants

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed this 14<sup>th</sup> day of November, 2025 in Brooklyn, New York.

4 /s/Roopal P. Luhana

5 **Roopal P. Luhana**  
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